



Port Angeles Business Association

P.O. BOX 545

Port Angeles, WA 98362

August 11, 2006

Mr. Pete Kmet
Department of Ecology
Toxic Cleanup Program
P.O. Box 47600
Olympia, WA 98504 – 7600

Re: MTCA Cleanup Regulation (Chapter 173-340 WAC)

Dear Mr. Kmet:

I am writing in behalf of the Port Angeles Business Association (PABA), a group of over 100 members representing the Port Angeles Business Community. We wish to comment on the proposed MTCA rule change. We are very concerned with the impact of adopting this rule on the economic welfare of our community.

We know, from the sampling that has been done for the Rayonier Site Cleanup Project that some samples taken in the city of Port Angeles would have acceptable dioxin levels under the existing rule, but would require cleanup under the new rule. At least one of those samples was taken from an area that would not have been influenced by the Rayonier plant operation. Our concern is that the existing "background levels" of dioxin mixtures in our city may exceed the acceptable limit under the new rule and, thus, impose unacceptable cleanup costs and depress real estate values. And, we suspect our situation is not atypical from other locales around the State, especially where wood burning for heat and incineration were common.

Everyone desires an environment free of toxic chemical contamination. And, we appreciate the need for specific limits on toxic chemical concentrations in our surroundings which are based on reasonable risks to human health. But, there is a level below which the reduction in health risks is so small as to not justify the extreme costs of achieving those limits. Our concern is that the proposed rule change is an example of that excessive mitigation cost for diminishing benefits.

Accordingly, we recommend DOE undertake an exhaustive, comprehensive, and credible cost/benefit analysis for this proposed rule change. This should be completed and reported out in the public hearings scheduled for the proposal. The study should certainly include the Port Angeles area, but also, other regions of the state which may be similarly impacted.

Since we are considering chemical analyses involving parts per trillion which may represent a minute particle in a soil sample, the public also deserves a thorough review of the entire process. A presentation is needed covering a review of the risk assessment assignment, from analysis, to exposure testing of animals, to the translation to humans, to the assignment of risk including the exposure basis. Also, the implications this risk assessment process has for changing the limits on acceptable dioxin mixture levels should be explained. While this process is complex and will require substantial preparation, the citizens of the state, who will bear the economic impacts of this rule change, need to understand the real benefits they will receive. This becomes even more important when DOE is imposing more stringent limits on dioxin mixtures than would be required under EPA standards.

Additionally, we request that one of the scheduled Public Hearings on the rule change be held in Port Angeles. It is most appropriate that the citizens of this community, who will be directly affected by this regulation change, be fully informed on the details, benefits, and costs.

We appreciate the opportunity to comment on the proposed rule change and remain available to discuss our position as you may require.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Orville Campbell". The signature is fluid and cursive, with the first name "Orville" and last name "Campbell" clearly distinguishable.

**Orville Campbell, President
Port Angeles Business Association**

**CC: Jay Manning, Director DOE
Laurie Davies
County Commissioners
Port Angeles City Council
File**